

ECF CASE  
JUDGE SCHEINDLIN

UNITED STATES DISTRICT COURT FOR THE  
SOUTHERN DISTRICT OF NEW YORK

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**J & J SPORTS PRODUCTIONS, INC.,** as  
Broadcast Licensee of the **May 5, 2007**  
**DeLaHoya/Mayweather** Program,  
Plaintiff,

**NOTICE OF MOTION FOR  
DEFAULT JUDGMENT**

-against-

Civil Action No.08-CV-952-SAS-JCF  
HON. SHIRA A. SCHEINDLIN

JUAN C. MORENO and LEODEGARIO ROJAS,  
Individually, and d/b/a SPEEDY GONZALEZ  
MEXICAN - AMERICAN RESTAURANT a/k/a  
SPEEDY GONZALEZ a/k/a SPEEDY  
GONZALEZ MEXICAN RESTAURANT,

and

SPEEDY GONZALEZ MEXICAN - AMERICAN  
RESTAURANT a/k/a SPEEDY GONZALEZ a/k/a  
SPEEDY GONZALEZ MEXICAN  
RESTAURANT,

Defendants.

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**PLEASE TAKE NOTICE** that upon the affirmation of Julie Cohen Lonstein, sworn to  
on the 17th day of March 2008, in support of said application and the exhibits attached thereto,  
Plaintiff moves this Court for an order granting the entry of default judgment against the  
Defendants jointly and severally as follows:

**Against, JUAN C. MORENO, Individually, and d/b/a SPEEDY GONZALEZ MEXICAN -  
AMERICAN RESTAURANT a/k/a SPEEDY GONZALEZ a/k/a SPEEDY GONZALEZ  
MEXICAN RESTAURANT,**

- 1) under 605(e)(3)(C)(i)(II) a sum *in the discretion of the Court*, of up to TEN  
THOUSAND DOLLARS (\$10,000.00)
- 2) and under 605(e)(3)(C)(ii) a sum *in the discretion of the Court*, of up to ONE  
HUNDRED THOUSAND DOLLARS (\$100,000.00) for enhanced damages for

Defendant's willful violation of 605(a)

- 3) and under 605(e)(3)(B)(iii) *in the discretion of the Court*, costs and Attorney fees of SIX HUNDRED SIX DOLLARS AND TWENTY FIVE CENTS (\$606.25)

**Against, LEODEGARIO ROJAS, Individually, and d/b/a SPEEDY GONZALEZ MEXICAN - AMERICAN RESTAURANT a/k/a SPEEDY GONZALEZ a/k/a SPEEDY GONZALEZ MEXICAN RESTAURANT**

- 1) under 605(e)(3)(C)(i)(II) a sum *in the discretion of the Court*, of up to TEN THOUSAND DOLLARS (\$10,000.00)
- 2) and under 605(e)(3)(C)(ii) a sum *in the discretion of the Court*, of up to ONE HUNDRED THOUSAND DOLLARS (\$100,000.00) for enhanced damages for Defendant's willful violation of 605(a)
- 3) and under 605(e)(3)(B)(iii) *in the discretion of the Court*, costs and Attorney fees of SIX HUNDRED SIX DOLLARS AND TWENTY FIVE CENTS (\$606.25)

**Against, SPEEDY GONZALEZ MEXICAN - AMERICAN RESTAURANT a/k/a SPEEDY GONZALEZ a/k/a SPEEDY GONZALEZ MEXICAN RESTAURANT**

- 1) under 605(e)(3)(C)(i)(II) a sum *in the discretion of the Court*, of up to TEN THOUSAND DOLLARS (\$10,000.00)
- 2) and under 605(e)(3)(C)(ii) a sum *in the discretion of the Court*, of up to ONE HUNDRED THOUSAND DOLLARS (\$100,000.00) for enhanced damages for Defendant's willful violation of 605(a)
- 3) and under 605(e)(3)(B)(iii) *in the discretion of the Court*, costs and Attorney fees of SIX HUNDRED SIX DOLLARS AND TWENTY FIVE CENTS (\$606.25)

Dated: March 17, 2008  
Ellenville, NY 12428

LONSTEIN LAW OFFICE, P.C.

By: /s/ Julie Cohen Lonstein  
Julie Cohen Lonstein  
Bar Roll No. JL8521  
Attorney for Plaintiff  
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Ellenville, NY 12428  
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**J & J SPORTS PRODUCTIONS, INC.**, as  
Broadcast Licensee of the **May 5, 2007**  
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Plaintiff,

-against-

**CLERK'S CERTIFICATE**

Civil Action No.08-CV-952-SAS-JCF  
HON. SHIRA A. SCHEINDLIN

JUAN C. MORENO and LEODEGARIO ROJAS,  
Individually, and d/b/a SPEEDY GONZALEZ  
MEXICAN - AMERICAN RESTAURANT a/k/a  
SPEEDY GONZALEZ a/k/a SPEEDY  
GONZALEZ MEXICAN RESTAURANT,

and

SPEEDY GONZALEZ MEXICAN - AMERICAN  
RESTAURANT a/k/a SPEEDY GONZALEZ a/k/a  
SPEEDY GONZALEZ MEXICAN  
RESTAURANT

Defendants.  
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I, J. Michael McMahon, Clerk of the United States District Court for the Southern District of New York, do hereby certify that the docket entries in the above entitled action indicates that the Defendants, JUAN C. MORENO and LEODEGARIO ROJAS, Individually, and d/b/a SPEEDY GONZALEZ MEXICAN - AMERICAN RESTAURANT a/k/a SPEEDY GONZALEZ a/k/a SPEEDY GONZALEZ MEXICAN RESTAURANT, and SPEEDY GONZALEZ MEXICAN - AMERICAN RESTAURANT a/k/a SPEEDY GONZALEZ a/k/a SPEEDY GONZALEZ MEXICAN RESTAURANT, were served with a copy of the Complaint and Summons on February 14, 2008.

I further certify that the docket entries indicate that JUAN C. MORENO and LEODEGARIO ROJAS, Individually, and d/b/a SPEEDY GONZALEZ MEXICAN -

AMERICAN RESTAURANT a/k/a SPEEDY GONZALEZ a/k/a SPEEDY GONZALEZ  
MEXICAN RESTAURANT, and SPEEDY GONZALEZ MEXICAN - AMERICAN  
RESTAURANT a/k/a SPEEDY GONZALEZ a/k/a SPEEDY GONZALEZ MEXICAN  
RESTAURANT have never submitted an answer or otherwise plead in defense of this action and  
their default is hereby noted.

Dated: \_\_\_\_\_, New York

March 10 2008

J. MICHAEL McMAHON  
Clerk

By: \_\_\_\_\_

Deputy Clerk